

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DEBORAH JONES-MACDONALD,  
*Plaintiff,*

vs.

RONALDO DELGADO, JR.,  
CHARLES RIBBE  
(in their individual capacities),  
HARRIS COUNTY, TEXAS,  
*Defendants.*

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CIVIL ACTION NO. 4:23-cv-2871

JURY TRIAL DEMANDED

**AGREED MOTION TO EXTEND PLAINTIFF’S RESPONSE DEADLINE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT SITTING IN  
THE SOUTHERN DISTRICT OF TEXAS:

Plaintiff DEBORAH JONES-MACDONALD (hereafter “Plaintiff”) files this Agreed Motion to Extend Plaintiff’s Response Deadline and in support, shows the following:

1. Defendant Harris County filed a Motion to Dismiss on January 2, 2024. Defendants Delgado and Ribbe filed a Motion to Dismiss on January 19, 2024. Plaintiff’s response deadline is Tuesday, February 13, 2024. Plaintiff needs additional time to respond.
2. Counsel has conferred with Defendant’s attorney, and The Harris County Attorney Office through attorney Jim Butt agreed to this proposed extension. Harris County Attorney Office’s representative Greg Burnett could not be contacted before the filing of this motion. Plaintiff respectfully requests that the response deadline be extended until February 27, 2024.

WHEREFORE, premises considered, the parties respectfully request that this Motion be granted, and that they be granted the relief requested above. A proposed Order is attached.

Respectfully submitted,

By: /s/ Drew Willey

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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferenced with James Butt, counsel for Defendant Harris County, and he agreed to extend the deadline as contained in this motion. Greg Burnett could not be contacted before filing this motion.

**/s/ Drew Willey**

**CERTIFICATE OF SERVICE**

I, Drew Willey, certify by my signature below that the foregoing document was electronically filed with this Court on February 12, 2024, which constitutes service on Filing Users.

**/s/ Drew Willey**